

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbkllp.com)  
Dara L. Silveira (#274923)  
(dsilveira@kbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO ONE HUNDRED  
FOURTEENTH OMNIBUS OBJECTION TO  
CLAIMS AND REQUEST FOR ORDER BY  
DEFAULT AS TO UNOPPOSED  
OBJECTIONS**

**[Re: Dkt. No. 11849]**

**Regarding Objections Set for Hearing  
March 2, 2022, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule  
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District  
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**  
8 **Management Order**”), that the Court enter an order by default on the following omnibus claims  
9 objection (the “**Omnibus Objection**”):

10

Docket Number	Omnibus Objection
11 11849	12 <i>Reorganized Debtors’ One Hundred Fourteenth Omnibus Objection to Claims (Passthrough Claims / Amended and Superseded Claims)</i> (the “ <b>One Hundred Fourteenth Omnibus Objection</b> ”)

13 **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

14 The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibit 1  
15 and Exhibit 2 to the Omnibus Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection  
18 [Docket No. 11851]. The Omnibus Objection was also supported by the declaration of Robb  
19 McWilliams [Docket No. 11850]. The Omnibus Objection, the Notice of Hearing, and the  
20 Declarations were served as described in the *Certificate of Service of Sonia Akter*, filed on January 27,  
21 2022 [Docket No. 11873]. Each holder of a claim listed on Exhibits 1 and 2 to the Omnibus Objection  
22 received a notice customized to include the claim number, debtor, claim amount and priority, and the  
23 basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and  
24 expunged.

25 The deadline to file responses or oppositions to the Omnibus Objection has passed. The  
26 Reorganized Debtors did not receive any formal or informal responses.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

5  
6

7

8  
9  
0

1

2

3

4